

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Fabian Andres Plata-Ocampo,

Defendant.

Case:2:20-cr-20252  
Judge: Roberts, Victoria A.  
MJ: Patti, Anthony P.  
Filed: 06-17-2020 At 11:08 AM  
INDI USA V. SEALED MATTER (DA)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(BULK CASH SMUGGLING – 31 U.S.C. § 5332 (a)(1), (2))

1. Defendant Fabian Andres Plata Ocampo, with the intent to evade a currency reporting requirement, knowingly concealed more than \$10,000 in currency on his person and in his vehicle and transported or transferred, or attempted to transport or transfer, such currency from a place within the United States to a place without the United States or from outside the United States to within the United States.

2. Specifically, on or about October 19, 2019, at approximately 7:00 pm, Defendant arrived at the Detroit Ambassador Bridge Port of Entry, which is in the Eastern District of Michigan. Defendant was driving a vehicle of which he was the sole occupant. Customs and Border Protection officers explained the currency

reporting requirements to Defendant and asked how much currency he was in possession of. Defendant stated that he was in possession of \$10,000 in currency.

3. Upon further inspection, CBPO located several bundles of United States currency hidden in the dashboard and several bags located in the vehicle. The total amount of United States currency found in the vehicle and on Defendant's person was approximately \$178,427.

All in violation of 31 U.S.C. § 5332(a) (1), (2).

FORFEITURE ALLEGATIONS  
(CRIMINAL FORFEITURE - 31 U.S.C. § 5332(b)(2), (4))

1. The allegations contained in Count 1 of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 31, United States Code, Section 5332.

2. As a result of the foregoing violations of Title 31, United States Code, Section 5332 as charged in Count 1, Defendant shall forfeit to the United States: any property, real or personal, involved the offense, and any property traceable to such property, including but not limited to:

- \$178,427 in United States currency.

3. Substitute Assets. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), Defendant shall forfeit substitute property, up to the value of the property described in paragraphs 1 and 2 above, if, by any act or omission of the defendant, the property

described in paragraphs 1 and 2 cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

4. Personal Money Judgment: Pursuant to 31 U.S.C. § 5332(b)(4), if the property subject to forfeiture under paragraph (2) is unavailable, and the Defendant has insufficient substitute property that may be forfeited pursuant to section 413(p) of the Controlled Substances Act, the court shall enter a personal money judgment against the defendant for the amount that would be subject to forfeiture.

**THIS IS A TRUE BILL.**

MATTHEW SCHNEIDER  
United States Attorney

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/Julie A. Beck  
Julie A. Beck  
Chief, Drug Task Force  
Assistant United States Attorney

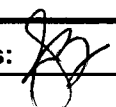
Date: June 17, 2020

United States District Court  
Eastern District of Michigan

**Criminal Case Cov**

Case:2:20-cr-20252  
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Fabian Andres Plata-Ocampo

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 19-mj-30652 ]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:


Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 17, 2020  
Date



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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.